

**THE ROSEN LAW FIRM, P.A.**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GANG KOU, INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS SIMILARLY  
SITUATED,

Plaintiff,

vs.

MEDIS TECHNOLOGIES LTD., ROBERT  
K. LIFTON, and ANDREW UDIS,

Defendants.

Case No.: 07CV3230 (PAC)

**[PROPOSED] ORDER APPOINTING  
LEAD PLAINTIFFS AND APPROVING  
LEAD PLAINTIFFS' SELECTION OF  
COUNSEL**

**[PROPOSED] ORDER**

WHEREAS, the above-captioned securities class action has been filed against defendants Medis Technologies, Ltd., Robert K. Lifton, and Andrew Udis, alleging violations of the federal securities laws;

WHEREAS, pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(a)(3)(A)(i), on April 23, 2007, Plaintiff in the first-filed action caused notice to be issued to potential class members of the action and informed them of their right to move to serve as lead plaintiff within 60 days of the date of the issuance of said notice;

WHEREAS, on June 22, 2007, Plaintiffs Chun Yu Wong, John Sellars, and Royce Oelschlager (the "Medis Investor Group"), moved the Court to: (1) appoint each of themselves

and collectively as lead plaintiffs; and (2) approve their selection of the Rosen Law Firm, P.A. as lead counsel; and

WHEREAS, the Court finding that Medis Investor Group has the largest financial interest in this action and *prima facie* satisfies the typicality and adequacy requirements of Fed. R. Civ. P. 23. See 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I).

**IT IS HEREBY ORDERED THAT:**

1. Pursuant to Section 21D(a)(3)(B) of the Exchange Act, 15 U.S.C. §78u-4(a)(3)(B), the Medis Investor Group and each of its members are appointed Lead Plaintiffs for the class as they have the largest financial interest in this litigation and otherwise satisfy the requirements of Fed. R. Civ. P. 23.

2. The Medis Investor Group's choice of counsel is approved and accordingly, the Rosen Law Firm, P.A. is appointed Lead Counsel.

3. Lead Counsel, after being appointed by the Court, shall manage the prosecution of this litigation. Lead Counsel is to avoid duplicative or unproductive activities and are hereby vested by the Court with the responsibilities that include, without limitation, the following: (1) to prepare all pleadings; (2) to direct and coordinate the briefing and arguing of motions in accordance with the schedules set by the orders and rules of this Court; (3) to initiate and direct discovery; (4) prepare the case for trial; and (5) to engage in settlement negotiations on behalf of Lead Plaintiffs and the Class.

SO ORDERED:

Dated \_\_\_\_\_, 2007

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HONORABLE PAUL A. CROTTY  
UNITED STATES DISTRICT JUDGE